

October 15, 2001

US EPA RECORDS CENTER REGION 5



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*Via Facsimile
and Regular Mail*

Mr. Thomas C. Nash
Associate Regional Counsel
United States Environmental Protection Agency
Mail Code: C-14J
Remedial Enforcement Support Section
77 West Jackson Blvd.
Chicago, IL 60604-3590

RE: Chemical Recovery Systems Site - Comments to Techlaw, Inc.'s September 28,
2001 Proposed Technical Approach To Waste-In List/Volumetric Ranking

Dear Tom:

My clients, Owens-Illinois, Inc. ("Owens-Illinois"), Goodrich Corporation (f.k.a. The B.F. Goodrich Company) ("Goodrich") and Jamestown Paint & Varnish Co. ("Jamestown") join the CRS Site Performing PRPs' Joint Comments from Doug McWilliams forwarded to you today. In addition, I have the following additional comments to Techlaw, Inc.'s ("Techlaw") Proposed Technical Approach To Waste-In List/Volumetric Ranking for the Chemical Recovery Systems Site in the Elyria, Ohio ("Site"):

1. Techlaw should not include witness statements in the allocation process, since there has been no opportunity for any of the Potential Responsible Parties ("PRPs") to cross-examine these witnesses;
2. Techlaw should not consider "Dirty Inventory List" entries with no recorded volume, since there is no reasonable method to assign a volume. For example, there is a reference in one of the 1979 Dirty Inventory Lists to Owens-Illinois with no associated volume, and thus, it should be disregarded; and
3. Techlaw did not address the use of Obitts Chemical Company purchase orders. To the extent that these purchase orders reflect a pick up and delivery in the same entry, Techlaw should not include this volume in the proposed allocation, since there is no indication that any of the material reached the Site. Additionally, every effort should be made to correlate these purchase orders (as well as the accounts receivable and accounts payable information) with the "Dirty Inventory Lists" to eliminate duplicate records.

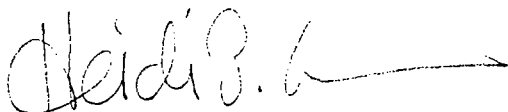
Finally, I reiterate Mr. McWilliams' request that the Performing PRPs have additional opportunities to comment as the Techlaw process develops.

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If you have any questions, do not hesitate to call me.

Very truly yours,



Heidi B. Goldstein

cc: Douglas A. McWilliams, Esq.
Chris Sheehey, Esq., Goodrich Corporation
Susan L. Smith, Esq., Owens-Illinois, Inc.
Nirav D. Parikh, Esq., Owens-Illinois, Inc.
Robert G. Walton, Esq.
Michael L. Hardy, Esq.